

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs,

V.

JOSHUA MAST, *et al.*,

Defendants,

and

UNITED STATES SECRETARY OF  
STATE ANTONY BLINKEN, *et al.*,

### Nominal Defendants.

Case No. 3:22-cv-49-NKM

## JOINT STIPULATION AND [PROPOSED] ORDER REGARDING PARTICIPATION IN DISCOVERY

Plaintiffs and Defendant Ahmad Osmani jointly stipulate as follows: Osmani preserves all Rule 12 and other defenses in this case, as may be applicable, including but not limited to Rule 12(b)(2) defenses for lack of personal jurisdiction. Osmani may participate in discovery while his motion to dismiss for lack of personal jurisdiction is pending, including by responding to Plaintiffs' discovery requests and by serving his own requests, without waiving any right or defense. Osmani's participation in any such discovery will not constitute a waiver of his rights or defenses in this litigation, including his right to contest personal jurisdiction.

**SO ORDERED.**

Date:

The Honorable Norman K. Moon  
U.S. District Judge for the Western District of Virginia

Submitted: June 27, 2023.

/s/ Kevin S. Elliker

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed electronically with the Court's CM/ECF system on June 27, 2023, which will serve a copy on counsel for the other parties. A copy of this filing may be accessed on the Court's CM/ECF site.

/s/B. Tyler Brooks  
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